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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF WYOMING**

UNITED STATES OF AMERICA,)

Plaintiff,)

v.)

Civil No. 14-CV-00151-ABJ

One Cessna Airplane, Model Number)
TU-206, bearing Tail Number N6214V)
and Serial Number U206-1189,)

and)

\$259,717 United States Currency,)

Defendant-Property.)

SCOTT MICHAEL LEWIS,)

Claimant.)

UNITED STATES' DESIGNATION OF EXPERT TESTIMONY

Plaintiff United States of America, by and through Assistant United States Attorneys Eric Heimann and C. Levi Martin, submits this designation of expert testimony in accordance with Local Rule 26.1.

The United States may call the following expert witness:

1. Antonio V. "Tony" Martinez
Aviation Enforcement Agent
U.S. Department of Homeland Security
Customs & Border Protection/Air & Marine Operations
1355 Customs Way/Building 605
March A. R. B. CA 92518-6363

Mr. Martinez is an Aviation Enforcement Agent and an expert in air smuggling investigations. Mr. Martinez is expected to testify in accordance with the opinions in the attached report he has prepared, as well as any additional opinions reached after reviewing additional discovery.

Mr. Martinez's opinions are based on the sources provided to him such as (1) Document 43-2, State of Wyoming Search Warrants and Detective Rona Parduba's, Cody Police Department report of investigation regarding this case; (2) FAA Certified Blue Ribbon Aircraft File N6214V (Bates Nos. Lewis-14CV58-Martinez through 00189B); (3) Photos from the search of the aircraft (Bates Nos. Lewis-14CV58-Martinez 00189 through 00223); (4) Photos from the search of the aircraft (Bates Nos. Lewis-14CV58-Martinez 00224 through 00246); and (5) HIS ROIs (Bates Nos. Lewis-14CV58-Martinez 00247 through 00272).

Mr. Martinez will be provided all pertinent depositions and discovery, and other discovery obtained from the Claimant, or coming into existence subsequent to the instant designation, which may alter or expand his opinions. It is expected that he will testify in accordance with his deposition, if taken. Discovery is still ongoing, therefore the Plaintiff reserves the right to supplement this designation.

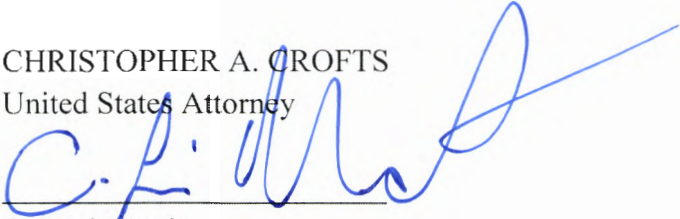
Mr. Martinez's resume is attached. Mr. Martinez has not authored any publications within the last ten years. Within the previous four years, Mr. Martinez has testified as an expert by deposition in one case (FAA Trial Docket SE-19775, Case No. 2012SW780015). Mr. Martinez is an employee of the United States and does not require compensation to be paid for his testimony. Undersigned counsel is unaware of any special requirements with respect to taking of Mr. Martinez's deposition, other than the expectation that the location of any deposition would be near March A. R. B. in California, thereby involving no travel expense. If travel is required, payment, by Claimant, for those associated expenses will need to be negotiated. Any deposition will also require coordination with Mr. Martinez's calendar.

1. The United States may call any expert witness listed by Claimant.
2. The United States reserves the right to name additional expert witnesses or amend its designation in light of investigation, discovery, or Orders of the Court.
3. The United States reserves the right to name other experts for impeachment or rebuttal.
4. The United States may supplement this designation in accordance with the Federal Rules of Civil Procedure.

Respectfully submitted this 19th day of January, 2016.

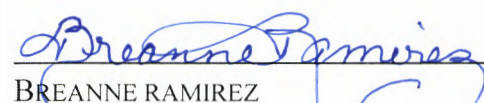
CHRISTOPHER A. CROFTS
United States Attorney

By:


C. Levi Martin
Assistant United States Attorney

CERTIFICATE OF SERVICE

IT IS HEREBY CERTIFIED that on January 19th, 2016, a copy of the **UNITED STATES' DESIGNATION OF EXPERT TESTIMONY** was served on all counsel of record by filing a copy of that document with the Court's CM/ECF system, which will send a notice of electronic filing to counsel of record.


BREANNE RAMIREZ
United States Attorney's Office